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October 9, 2018

**BY ECF**

Hon. Gregory H. Woods  
United States Courthouse  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**RE. *Zayas v. 569 Hudson LLC, et al.*  
18cv7091 (GHW)(RWL)**

Dear Judge Woods:

I represent the plaintiff in the above referenced action and submit this letter motion to request an extension of time to file the status letter and proposed Case Management Plan, which are due on October 9, 2018, and an adjournment of the initial conference scheduled for October 16, 2018.

At the present time, parties have not responded to the complaint served upon them on August 17, 2018.

In an effort to avoid moving for a default judgment, I intend to serve each defendant again at their corporate and actual business address. Consequent, I respectfully request an extension of time and adjournment of the initial conference, and propose submitting a status report to the court on November 15, 2018.

Thank you very much for your consideration and are available to address any questions the court may have.

Respectfully Submitted,

/s/ James E. Bahamonde

James E. Bahamonde, Esq.